

6 Everett Street, Suite 5116 Cambridge, MA 02138 617.496.2058 (tel.) 617.384.7633 (fax)

June 25, 2019

VIA ELECTRONIC MAIL - hq.foia@epa.gov

National FOIA Office U.S. Environmental Protection Agency William Jefferson Clinton Federal Building 1200 Pennsylvania Avenue, N.W. (2310A) Washington, D.C. 20460 hq.foia@epa.gov

RE: Freedom of Information Act Appeal: EPA-R6-2018-000485 (Crosby, Texas, Arkema Facility, Emissions Data and Correspondence)

Dear FOIA Officer:

The Harvard Law School Emmett Environmental Law & Policy Clinic (the Clinic) is hereby appealing the U.S. Environmental Protection Agency Region 6's (EPA) response to the Clinic's request pursuant to the Freedom of Information Act, 5 U.S.C. § 552, as amended (FOIA), assigned FOIA Request No. EPA-R6-2018-000485 (the FOIA Request). EPA issued a final determination letter for the FOIA Request on April 2, 2019. As detailed below, EPA's search was inadequate and thus failed to produce responsive records.

FACTUAL BACKGROUND ABOUT THE CLINIC'S FOIA REQUEST

On October 12, 2017, the Clinic sent the FOIA Request to EPA by email. <u>Attachment A.</u> In its request, the Clinic sought the following records:

- 1. Inspections at the Arkema facility in Crosby, Texas conducted pursuant to the facility's Risk Management Plan between January 2010 and October 12, 2017;
- 2. All sampling data, flyover records, and inspections at or from the Arkema facility in Crosby, Texas, and any results and analysis of such monitoring and inspections between January 2010 and October 12, 2017;

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¹ The Clinic sent the same request to EPA Headquarters on October 20, 2017 (EPA-HQ-2018-000841); this FOIA request was closed on November 20, 2018 with a determination that "the Office of Land and Emergency Management does not have responsive documents to this request." Rather, EPA Headquarters reported that "Region 6... would have responsive documents related to what you're requesting."

- 3. Any correspondence between the EPA and any employee, owner, representative of, or lobbyist representing the Arkema facility in Crosby Texas between January 2015 and October 12, 2017; and
- 4. Any correspondence within the EPA or between the EPA and other federal or state government officials concerning the Arkema facility in Crosby, Texas between January 2010 and October 12, 2017.

Id. The Clinic further asked EPA to redact any exempt portions of the responsive records and provide all non-privileged, non-exempt portions of the records in its response. *Id.*

EPA began producing documents in response to the FOIA Request in November 2017 and referring the Clinic to public websites and related requests.² On April 2, 2019, EPA "concluded its search and review for responsive records." <u>Attachment B (Final Determination Letter)</u>. EPA further informed the Clinic that the FOIA Request was referred to the United States Department of Defense, Transportation Security Administration, National Oceanic and Atmospheric Administration, and Federal Emergency Management Agency for additional review. *See id.*

DISCUSSION

FOIA requires agencies to conduct searches that are "reasonably calculated to uncover all relevant documents." Weisberg v. U.S. Dep't of Justice, 705 F.2d 1344, 1351 (D.C. Cir. 1983). The agency must make a good faith effort to conduct a search for the requested records and follow "clear leads" that "may indicate, for example, other offices that should have been searched, additional search terms that should been used, or records custodians who should have been consulted." Rollins v. U.S. Dep't of State, 70 F.Supp.3d 546, 550 (D.D.C. 2014). Records provided or referred to the Clinic in response to the FOIA Request establish a "sufficient predicate" for searching for the following categories of additional records, which are at the heart of the FOIA Request. Campbell v. U.S. Dep't of Justice, 164 F.3d 20, 28–29 (D.C. Cir. 1998) (citation omitted).

I. GROUND AIR MONITORING DATALOGS

According to records from EPA, the agency conducted its own ground air-monitoring at the Arkema site outside the 1.5 mile evacuation zone using the following equipment: MultiRae Plus (a multi-sensor configuration photo ionization monitor that detects O₂, H₂S, LEL, VOC, SO₂, and CO), the Draeger Chip Management System or CMS (chemical-specific chips and colormetric tubes that were chosen to detect chlorine and SO₂), and additional equipment such as AreaRAEs.³

The Clinic's review of FOIA productions to which it was referred by EPA suggests that *at least* the MultiRae Plus monitors (PMG 50-5P) and AreaRAEs are capable of generating and

² In total, EPA referred the Clinic to responses to 22 other FOIA requests.

³ EPA-R6-2018-000485, R06-7045387.

recording raw data (*i.e.*, datalogging). However, EPA only provided one MultiRae Plus monitor reading for the Arkema site from August 31, 2017 (monitored chemical compounds include SO₂, VOC, and H₂S). This print-out is a "clear lead" that additional records, *i.e.* datalogs, exist for EPA ground air monitoring efforts at the Arkema site in Crosby, Texas. The Clinic requests that EPA produce these records in accordance with FOIA's requirements.

II. FINAL VERSIONS OF THE ASPECT REPORTS

Records responsive to the FOIA Request establish sufficient grounds of EPA's failure to produce revised, final versions of Airborne Spectral Photometric Environmental Collection Technology (ASPECT) reports. For example, communications provided to the Clinic regarding version 7 of the ASPECT Report, dated September 2, 2017, confirm that the report was revised several times to include chemical detections later in the day.⁶ The name of the document attached to one of these communications is "Preliminary Report for ASPECT Hurricane Harvey v8.pdf".⁷ These communications indicate that ASPECT reports were revised over the course of a day and that final versions of such reports exist. The Clinic requests that EPA produce all final ASPECT reports in accordance with FOIA's disclosure mandate.⁸

III. AIR EMISSIONS REPORT FROM THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Records responsive to the FOIA Request indicate that additional searches are warranted for Dr. Michael Honeycutt's air emissions report to Liz Bowman (EPA Headquarters) and David Gray (EPA Region 6). On September 4, 2017, Liz Bowman emailed Ryan Vise at the Texas Commission on Environmental Quality (TCEQ) requesting air monitoring data around Crosby, Texas. Ryan Vise forwarded Bowman's message to Dr. Michael Honeycutt, who then replied to Bowman and David Gray with multiple attachments. Dr. Honeycutt reported that he was "going to put [the data] into some coherent shape and write a report on it in the next couple of days." These communications indicate that a report by Dr. Honeycutt concerning air emissions

⁴ EPA-R6-2018-004551, R06-7058029 ("Multi-gas Monitor (PMG50-5P)"); EPA-R6-2018-000165, R06-7007270 (September 2017 AreaRAE, Multi-gas MultiRAE, ToxiRAE, and UltraRAE monitor datalogs for Manchester by START Region 6); see also RAE SYSTEMS, MULTIRAE PLUS: PGM-50/4, PGM-50/4P, PGM-50/5P MULTIPLE-GAS MONITOR - USER MANUAL (Feb. 2010), https://www.raesystems.com/sites/default/files/content/resources/Manual_MultiRAE-Plus 008-4022-000 Revc.pdf.

⁵ EPA-R6-2018-004551, R06-7058029.

⁶ EPA-R6-2017-011153, R06-7027830; EPA-R6-2018-000485, R06-7017952.

⁷ EPA-R6-2018-000485, R06-7017952.

⁸ In addition to the daily ASPECT reports, the Clinic expects EPA to provide the final version of the 2017 ASPECT Report for Hurricane Harvey. EPA-R6-2018-003798, R06-9718497 (Draft 2017 ASPECT Report).

⁹ EPA-R6-2018-004551, R06-7057922.

¹⁰ See id.

¹¹ *Id.*

data around Crosby, Texas exists and was sent to EPA. The Clinic requests that EPA produce this report in accordance with FOIA's disclosure mandate.

CONCLUSION

We look forward to EPA's response within twenty (20) working days. 5 U.S.C. § 552(a)(6)(A)(ii); 40 C.F.R. § 2.104(k). Please send all records and any related correspondence by email to ajoroff@law.harvard.edu.

Sincerely,

Aladdine Joroff

Attachments:

Attachment A: Attachment A (The Clinic's October 12, 2017 FOIA Request to EPA Region 6):

Attachment B: Attachment B (Final Determination Letter).

Attachment A



Wendy B. Jacobs, Esq.
Emmett Clinical Professor of
Environmental Law and Director
6 Everett Street, Suite 4119
Cambridge, MA 02138
617.496.3368 (tel.)
617.384.7633 (fax)
wjacobs@law.harvard.edu

October 12, 2017

Leticia Lane
Regional Freedom of Information Officer
U.S. Environmental Protection Agency - Region 6
Fountain Place 12th Floor, Suite 1200
1445 Ross Avenue (6MD-OE)
Dallas, TX 75202-2733

Re: Freedom of Information Act Request — Crosby, TX Arkema Facility's Risk Management Plan, Inspection Records, and Sampling Records

Dear Officer Lane:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552 et seq., and the implementing regulations of the Environmental Protection Agency (EPA), 40 C.F.R. Part 2, I am submitting the following request for records on behalf of the Emmett Environmental Law and Policy Clinic at Harvard Law School.

Requested Records

Specifically, the Clinic requests the Risk Management Plan, required by 42 U.S.C. § 7412(r), for the Arkema facility in Crosby, Texas, and records¹ regarding the following:

(1) Inspections at the Arkema facility in Crosby, Texas conducted pursuant to the facility's Risk Management Plan between January 2010 and the present;

- Any handwritten, typed or printed documents (such as memoranda, emails, books, brochures, studies, writings, drafts, letters, transcripts, minutes, notes, meeting notes, correspondence, and calendars);
- Raw data, data analysis, data interpretations, maps, tables, reports, summaries, diagrams, statements of policy and interpretations, administrative staff manuals and instructions to staff, regardless of physical form or format; and
- Documentary material in other forms (such as audio or video recordings, slides, and photographs).

¹ For the purposes of this request, records include, but are not limited to:

- (2) All sampling data, flyover records, and inspections at or from the Arkema facility in Crosby, Texas, and any results and analysis of such monitoring and inspections between January 2010 and the present;
- (3) Any correspondence between the EPA and any employee, owner, representative of, or lobbyist representing the Arkema facility in Crosby Texas between January 2015 and the present; and
- (4) Any correspondence within the EPA or between the EPA and other federal or state government officials concerning the Arkema facility in Crosby, Texas between January 2010 and the present;

To the extent practicable, please provide records by email. If EPA maintains that portions of a requested record are exempt from disclosure, please redact the exempt portions and provide the remainder of the record.

Request for Fee Waiver

EPA regulations provide that "educational or scientific institutions, whose purpose is scholarly, noncommercial research, will be charged only for the cost of record duplication, except that the first 100 pages of duplication will be furnished at no charge." 40 C.F.R. § 2.107(c)(ii). The Clinic qualifies under this standard for a fee waiver as Harvard Law School is an educational institution, and the Clinic requests these records for educational purposes and will realize no commercial benefit from the release of the requested records. Please contact me if copying fees are expected to exceed \$100.

Sincerely,

Wendy B. Jacobs

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Attachment B



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

VIA FOIAonline

Wendy B. Jacobs Harvard Law School 6 Everett Street, Suite 4119 Cambridge, MA 02138

RE: Freedom of Information Act (FOIA) Request: EPA-R6-2018-000485

Dear Ms. Jacobs:

This letter concerns the above-referenced FOIA request, received by the U.S. Environmental Protection Agency on October 13, 2017, in which you requested information regarding the risk management plan, inspection records, and sampling records pertaining to the Arkema plant located at 18000 Crosby Eastgate Road, Crosby, Texas 77532.

EPA has concluded its search and review for responsive records. The records have been uploaded to the FOIAonline system. You can access your records by going to FOIAonline at https://foiaonline.gov/foiaonline/action/public/home and searching by your FOIA request number. You are also being referred to documents accessible in FOIAonline for eight other FOIA requests which you can view by searching for FOIA request numbers: EPA-R6-2017-011046, EPA-R6-2017-011509, EPA-R6-2017-011716, EPA-R6-2018-000165, EPA-R6-2018-000801, EPA-R6-2018-003798, EPA-R6-2018-010660, and EPA-R6-2019-001324.

However, some records have been withheld in whole or in part as redacted documents with information being partially released. The information being withheld in whole has been determined to be exempt from the mandatory disclosure requirements pursuant to 5 U.S.C. § 552(b)(3) – Nondisclosure Provisions contained in other federal statutes specifically, 49 CFR parts 15 and 1520 - Protection of Sensitive Security Information; 42 U.S.C § 7412(r)(7)(H)(v); 40 C.F.R. §§ 1400, Chemical Safety Information Site Security and Fuels Regulatory Relief Act; and pursuant to 5 U.S.C. § 552(b)(5) – Deliberative Process Privilege. The documents being withheld in part has been determined to be exempt from the mandatory disclosure requirements pursuant to 5 U.S.C. § 552(b)(5) – Attorney Work Product and Deliberative Process Privilege, 5 U.S.C. § 552(b)(6) – Personal Privacy, 5 U.S.C. § 552(b)(3) – Nondisclosure Provisions contained in other federal statutes specifically, 42 U.S.C § 7412(r)(7)(H)(v); 40 C.F.R. §§ 1400, Chemical Safety Information Site Security and Fuels Regulatory Relief Act. The withheld or redacted records are listed on the enclosed two denial logs.

In addition, there are documents you seek that are records of specific concern to the following agencies:

- United States Department of Defense / Defense Threat Reduction Agency 126 documents,
- Transportation Security Administration 5 documents,
- National Oceanic and Atmospheric Administration 4 documents, and
- Federal Emergency Management Agency 3 documents.

We are referring your FOIA request along with the potentially responsive records that originated with each respective agency to make the final determination on whether the records are releasable. You should receive a response directly from each of the agencies. If you have questions regarding the records referred to the Defense Threat Reduction Agency, please contact the United States Department of Defense / Defense Threat Reduction Agency FOIA office directly at <a href="https://docs.org/dreat-states-negarding

This letter concludes our response to your request. You may appeal this response by email at hq.foia@epa.gov, or by mail to the EPA's National FOIA Office, U.S. EPA, 1200 Pennsylvania Avenue, N.W. (2310A), Washington, DC 20460 or through FOIAonline if you are an account holder. If you are submitting your appeal by hand delivery, courier service, or overnight delivery, you must address your correspondence to 1200 Pennsylvania Avenue, N.W., Room 5315, Washington, DC 20460. Your appeal must be in writing, and it must be received no later than 90 calendar days from the date of this letter. The Agency will not consider appeals received after the 90-calendar-day limit. Appeals received after 5:00 p.m. EST will be considered received the next business day. The appeal letter should include the FOIA tracking number listed above. For quickest possible handling, the subject line of your email, the appeal letter, and its envelope, if applicable, should be marked "Freedom of Information Act Appeal." Additionally, you may seek dispute resolution services from EPA's FOIA Public Liaison at hq.foia@epa.gov or (202) 566-1667, or from the Office of Government Information Services (OGIS). You may contact OGIS in any of the following ways: by mail, Office of Government Information Services, National Archives and Records Administration, Room 2510, 8610 Adelphi Road, College Park, MD 20740-6001; email, ogis@nara.gov; telephone, (202) 741-5770 or (877) 684-6448; or fax, (202) 741-5769. If you have any questions concerning this response, please contact the Regional FOIA officer Nancy Ho at r6foia@epa.gov.

Sincerely,

4/2/2019



James McDonald

Signed by: JAMES MCDONALD
Assistant Regional Administrator for
Management

Enclosures (2)

DOCUMENT ID	DOCUMENT DATE	PAGE COUNT	TITLE	ADDRESSEE	AUTHOR
			FAA TO ISSUE RADIO CODE		
			FOR ASPECT FLIGHTS TO USE IF		
			THEY NEED TO MAKE A FLIGHT	MASON, STEVE (U.S.	KUDARAUSKAS,
7021804	08/29/2017	3	AT ARKEMA CROSBY	EPA)	PAUL (U.S. EPA)

DOCUMENT ID	DOCUMENT DATE	PAGE COUNT	TITLE	ADDRESSEE	AUTHOR
			ATTACHMENT A FACILITY		
			ENFORCEMENT AND		
			COMPLIANCE SUMMARY	None (NONE	None (NONE
7028333	08/31/2017	3	ARKEMA CROSBY	SPECIFIED)	SPECIFIED)
			ATTACHMENT A EXAMPLE		
			FECS FACILITY ENFORCEMENT	None (NONE	None (NONE
7029841	09/01/2017	3	AND COMPLIANCE SUMMARY	SPECIFIED)	SPECIFIED)

^{*}Chemical Safety Information Site Security and Fuels Regulatory Relief Act Denial Log for EPA-R6-2018-000485 - Arkema (a.k.a.) Pennwalt Corporation - Crosby Plant

DOCUMENT ID	DOCUMENT DATE	PAGE COUNT	TITLE	ADDRESSEE	AUTHOR
				None (NONE	
7022804	09/04/2017	4	DRAFT ARKEMA POLREP 1	SPECIFIED)	None (NONE SPECIFIED)
			ARKEMA CHEMICAL FACILITY		
			POTENTIAL RELEASE EPA	None (NONE	
7028162	Undated	2	RESPONSE STRATEGY	SPECIFIED)	NONE (U.S. EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
				BREEN, BARRY (U.S.	
			ADVISEMENT ON WHO	EPA) CHEATHAM,	
			HOLDS THE LEGAL	REGGIE (U.S. EPA)	
			AUTHORITY TO ADDRESS	COLEMAN, SAM (U.S.	GRAY, DAVID (U.S.
7038102	08/31/2017	2	ARKEMA EXPLOSION	EPA)	EPA)
			TRANSMITTAL OF DRAFT		
			POTENTIAL EPA RESPONSE	COLEMAN, SAM (U.S.	
			AUTHORITIES ARKEMA	EPA) GRAY, DAVID	PAYNE, JAMES, O
7038141	08/31/2017	3	CROSBY TEXAS	(U.S. EPA)	(U.S. EPA)
			FORWARD OF DISCUSSION		
			ON EPA AUTHORITY TO	COLEMAN, SAM (U.S.	
			ADDRESS ARKEMA	EPA) GRAY, DAVID	PAYNE, JAMES, O
7038179	08/31/2017	4	EXPLOSION	(U.S. EPA)	(U.S. EPA)
			REQUEST TO BE		
			FORWARDED NOTES ON	COLEMAN, SAM (U.S.	
			SUMMARY OF LEGAL	EPA) GRAY, DAVID	
			AUTHORITIES TO ADDRESS	(U.S. EPA) LEWIS,	PAYNE, JAMES, O
7038293	08/31/2017	3	ARKEMA EXPLOSION	JEN (U.S. EPA)	(U.S. EPA)
			NOTIFICATION THAT OGC IS		
			COORDINATING WITH EPA	COLEMAN, SAM (U.S.	
			PERSONNEL AND ARE	EPA) GRAY, DAVID	
			PREPARING TO SEND A	(U.S. EPA) LEWIS,	PAYNE, JAMES, O
7038294	08/31/2017	4	DEEPER DIVE DOCUMENT	JEN (U.S. EPA)	(U.S. EPA)
			SYNOPSIS OF EPA LEGAL	COLEMAN, SAM (U.S.	
			AUTHORITIES TO ADDRESS	EPA) GRAY, DAVID	PAYNE, JAMES, O
7038295	08/31/2017	2	ARKEMA EXPLOSION	(U.S. EPA)	(U.S. EPA)
			ADVISEMENT THAT		
			SYNOPSIS OF EPA LEGAL		
			AUTHORITIES TO ADDRESS		
			ARKEMA EXPLOSION	PAYNE, JAMES, O	COLEMAN, SAM (U.S.
7038391	08/31/2017	3	NEEDS MORE DETAIL	(U.S. EPA)	EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			RESPONSE TO REQUEST FOR		
			NOTES REGARDING		
			SYNOPSIS OF EPA LEGAL		
			AUTHORITIES TO ADDRESS	PAYNE, JAMES, O	COLEMAN, SAM (U.S.
7038392	08/31/2017	4	ARKEMA EXPLOSION	(U.S. EPA)	EPA)
			NOTIFICATION THAT EPA		
			LIKELY HAS THE CERCLA	COLEMAN, SAM (U.S.	
			AUTHORITY TO ADDRESS	EPA) GRAY, DAVID	PAYNE, JAMES, O
7038400	08/31/2017	2	ARKEMA EXPLOSION	(U.S. EPA)	(U.S. EPA)
			DRAFT POTENTIAL EPA		
			RESPONSE AUTHORITIES	None (NONE	
7038470	08/31/2017	5	ARKEMA CROSBY TEXAS	SPECIFIED)	NONE (U.S. EPA)

DOCUMENT	DOCUMENT	PAGE	TITLE	ADDRESSEE	AUTHOR
ID	DATE	COUNT	HILE	ADDRESSEE	AUINUK
			REDACTED RISK MANAGEMENT PLAN		
			FOR ARKEMA INCORPORATED -		
			CROSBY PLANT - PLAN SEQUENCE NO.	None (NONE	
9719495	08/31/2017	25	1000040822	SPECIFIED)	NONE (U.S. EPA)
			REDACTED RISK MANAGEMENT PLAN		
			REPORT FOR THE ARKEMA		
			INCORPORATED CROSBY PLANT	None (NONE	
9719499	08/31/2017	25	06/11/2014	SPECIFIED)	NONE (U.S. EPA)
			REDACTED RISK MANAGEMENT PLAN		
			REPORT FOR THE ARKEMA CROSBY	None (NONE	
9719500	08/31/2017	25	PLANT	SPECIFIED)	NONE (U.S. EPA)
			REDACTED RISK MANAGEMENT PLAN		
			REPORT FOR THE ARKEMA CROSBY	None (NONE	
9719501	08/31/2017	25	PLANT	SPECIFIED)	NONE (U.S. EPA)

^{*}Chemical Safety Information Site Security and Fuels Regulatory Relief Act Denial Log for EPA-R6-2018-000485 - Arkema (a.k.a.) Pennwalt Corporation - Crosby Plant

DOCUMENT ID		PAGE COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] PAGES FROM BRYANT		
			SMALLEY LOGBOOK ON HURRICANE	None (NONE	SMALLEY, BRYANT
9796853	10/27/2017	7	HARVEY 2017	SPECIFIED)	(U.S. EPA)
			[REDACTED] PAGES FROM BRYANT		
			SMALLEY LOGBOOK ON HURRICANE	NONE (NONE	SMALLEY, BRYANT
9796860	10/27/2017	7	HARVEY 2017	SPECIFIED)	(U.S. EPA)

^{*}Chemical Safety Information Site Security and Fuels Regulatory Relief Act Denial Log for EPA-R6-2018-000485 - Arkema (a.k.a.) Pennwalt Corporation - Crosby Plant

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] WEEKLY		
			ACTIVITY REPORT FOR THE		
			WEEK ENDING 09/15/2017		
			REGION 6 OFFICE OF	NONE (NONE	
9796901	09/14/2017	5	REGIONAL COUNSEL	SPECIFIED)	NONE (U.S. EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] RECEIPT OF		
			WEEKLY UPCOMING HOT		
			ISSUES AND IMPORTANT	GRAY, DAVID (U.S.	ASSUNTO, CARMEN
9719472	10/06/2017	6	DEADLINES	EPA)	(U.S. EPA)
			[REDACTED] INQUIRY		
			REGARDING DATE		
			REFERENCED IN SAN		
			JACINTO WRITEUP FOR		
			REGION 6 WEEKLY REPORT		
			OF UPCOMING HOT ISSUES		
			AND IMPORTANT	GRAY, DAVID (U.S.	HARRISON, BEN (U.S.
9719473	10/05/2017	5	DEADLINES	EPA)	EPA)
				ASSUNTO, CARMEN	
			[REDACTED] WEEKLY	(U.S. EPA) DURANT,	
			REPORT OF UPCOMING HOT	JENNAH (U.S. EPA)	
			ISSUES AND IMPORTANT	HUBBARD, JOSEPH	GRAY, DAVID (U.S.
9796868	10/06/2017	6	DEADLINES	(U.S. EPA)	EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			REDACTED FORWARD OF		
			LIST OF CURRENTLY	LOESEL, MATTHEW (U.S.	
			SCHEDULED TCEQ	EPA) BRESCIA, NICOLAS	
9719502	09/01/2017	2	CONFERENCE CALLS	(U.S. EPA)	MARTIN, JOHN (U.S. EPA)
			[REDACTED] NOTIFICATION		
			OF UPDATE REGARDING		
			SIGNIFICANT ISSUE AT	CARROLL, CRAIG (U.S. EPA)	
			ARKEMA CROSBY PLANT	FOSTER, ALTHEA (U.S.	
			IN CROSBY, TEXAS, WITH	EPA) SMITH, MONICA, C	
9796692	08/29/2017	4	CONTACT LIST	(U.S. EPA)	FIFE, GREG (U.S. EPA)
			[REDACTED] FURTHER		
			FORWARDING OF		
			NOTIFICATION THAT		
			IMAAC HAS BEEN ASKED		
			TO CREATE A MODELING		
			PRODUCT FOR		
			HYPOTHETICAL CHEMICAL		
			RELEASE IN CROSBY		
			TEXAS AND INVITATION TO	, , , , , , , , , , , , , , , , , , , ,	BERNIER, ROBERTO, L (U.S.
9796694	08/29/2017	1	TELECONFERENCE	MASON, STEVE (U.S. EPA)	EPA)
			[REDACTED] INOPERABLE		
			PUBLIC WATER SYSTEMS		
			AND WASTEWATER AND		
				SMITH, MONICA, C (U.S.	
				EPA), FOSTER, ALTHEA	
			INVITATION TO TCEQ	(U.S. EPA), CARROLL,	CROSSLAND, RONNIE, D
9796846	08/30/2017	30	CONFERENCE CALL	CRAIG (U.S. EPA)	(U.S. EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] UPDATE		
			REGARDING STATUS AT		
			ARKEMA CROSBY PLANT		SOTELO, CATHERINE
	Transporter Print		WITH WEBLINKS TO		(TEXAS COMMISSION ON
			RELATED ARTICLES AND		ENVIRONMENTAL
9796849	08/29/2017	3	COMMENTS	MASON, STEVE (U.S. EPA)	QUALITY)
	THE		[REDACTED] FURTHER		
			RESPONSE TO REQUEST	YOUNG, PATRICK (AGENCY	
			FOR POINT OF CONTACT	FOR TOXIC SUBSTANCES	
			WITH POISON CONTROL	AND DISEASE REGISTRY)	
			REGARDING HEALTH	RHOTENBERRY, WILLIAM	BAKER, DAVID (BAYLOR
9796850	08/30/2017	2	CONCERNS AT ARKEMA	(U.S. EPA)	SCOTT & WHITE HEALTH)
			[REDACTED] PRELIMINARY		
			DRINKING WATER		
	Vicinity PV Vicinity		SAMPLING RESULTS		
	and the second		ARKEMA CROSBY		
			HURRICANE HARVEY		
9796851	Undated	108	RESPONSE	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)
			[REDACTED] TRANSMITTAL		
	THE CONTRACTOR OF THE CONTRACT		OF ACTIVE AND		
	Vicinity Poly Poly		RESCINDED BOIL WATER		
	and the second		NOTICES		
			SUMMARY^INOPERABLE		
			PUBLIC DRINKING WATER		
	NA CANADA		AND WASTEWATER	CARROLL, CRAIG (U.S. EPA)	
	Territoria de la constanta de		SYSTEMS^AND THE TCEQ	FOSTER, ALTHEA (U.S.	
			HURRICANE HARVEY	EPA) SMITH, MONICA, C	CROSSLAND, RONNIE, D
9796852	08/31/2017	4	UPDATE NO. 9	(U.S. EPA)	(U.S. EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] LIST OF NRC		
			SPILL REPORTS FROM		
	Name of Contract o		08242017 THROUGH		
9796854	09/21/2017	6	09212017	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)
			[REDACTED] TRANSMITTAL		
	Transport Privates		OF INOPERABLE PUBLIC		
			DRINKING WATER		
			SYSTEMS AND WASTE		
			WATER SYSTEMS		
	and the second		SUMMARY REPORT^BOIL		
			WATER NOTICE SUMMARY		
			REPORT^AND UPDATED	SMITH, MONICA, C (U.S.	
	The state of the s		WASTEWATER SANITARY	EPA) WEBSTER, SUSAN, D	
			SEWER OVERFLOW REPORT	(U.S. EPA) FOSTER,	CROSSLAND, RONNIE, D
9796855	09/01/2017	5	WITH UPDATE NO. 10	ALTHEA (U.S. EPA)	(U.S. EPA)
			[REDACTED] TRANSMITTAL		
	Name of the Control o		OF BOIL WATER NOTICE		
			SUMMARY REPORT^AND		
	TO THE PROPERTY OF THE PROPERT		INOPERABLE PUBLIC		
	Name of Contract o		DRINKING WATER		
			SYSTEMS AND WASTE	CARROLL, CRAIG (U.S. EPA)	
	THE PROPERTY OF THE PROPERTY O		WATER SYSTEMS	FOSTER, ALTHEA (U.S.	
			SUMMARY REPORT WITH	EPA) SMITH, MONICA, C	CROSSLAND, RONNIE, D
9796856	08/31/2017	5	UPDATE NO. 9	(U.S. EPA)	(U.S. EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] TRANSMITTAL		
			OF BOIL WATER NOTICE		
			SUMMARY		
			REPORT^INOPERABLE		
			PUBLIC DRINKING WATER		
			SYSTEM SUMMARY		
			REPORT^INOPERABLE		
			WASTE WATER SYSTEM		
			SUMMARY REPORT AND	SMITH, MONICA, C (U.S.	
			SITUATION REPORT	EPA) WEBSTER, SUSAN, D	
			NUMBER 4 WITH UPDATE	(U.S. EPA) FOSTER,	CROSSLAND, RONNIE, D
9796857	09/03/2017	6	NO. 12	ALTHEA (U.S. EPA)	(U.S. EPA)
			[REDACTED] FORWARD OF		
			SUMMARY FROM UPDATE	SMALLEY, BRYANT (U.S.	
9796858	09/04/2017	9	CALL NUMBER 13	EPA)	CARROLL, CRAIG (U.S. EPA)
				SMITH, MONICA, C (U.S.	
			[REDACTED] FORWARD OF	EPA) WEBSTER, SUSAN, D	
			SUMMARY FROM UPDATE	(U.S. EPA) SMALLEY,	CROSSLAND, RONNIE, D
9796859	09/05/2017	9	CALL NUMBER 13	BRYANT (U.S. EPA)	(U.S. EPA)
			[REDACTED] NRC SPILL		
			REPORTS 08242017		
			THROUGH 09212017 WITH		
9796861	09/21/2017	2	EMAIL TRANSMITTAL	MASON, STEVE (U.S. EPA)	DELGADO, ERIC (U.S. EPA)
			[REDACTED] FINAL		
			HURRICANE HARVEY		
			UPDATE 1700 CDT WITH		
9796862	09/08/2017	11	EMAIL TRANSMITTAL	NONE (NONE SPECIFIED)	NONE (U.S. EPA)
			[REDACTED] LIST OF		
			NATIONAL RESPONSE		
			CENTER SPILL REPORTS		
9796863	09/21/2017	3	WITH EMAIL TRANSMITTAL	MASON, STEVE (U.S. EPA)	DELGADO, ERIC (U.S. EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] FORWARD OF		
			NOTIFICATION OF	LOESEL, MATTHEW (U.S.	
			UPCOMING CONFERENCE	EPA) BRESCIA, NICOLAS	
9796864	09/01/2017	2	CALLS	(U.S. EPA)	MARTIN, JOHN, J (U.S. EPA)
			[REDACTED] RESPONSE TO		
			UPDATE ON ARKEMA	SOTELO,CATHERINE	
			CROSBY PLANT	(TEXAS COMMISSION ON	
			INUNDATED WITH WATER	ENVIRONMENTAL	
9796865	08/29/2017	3	AND POTENTIAL FIRE	QUALITY)	MASON, STEVE (U.S. EPA)
			[REDACTED] NRC SPILL		
			REPORTS FROM 08242017 TO		
			09212017 WITH		
9796866	09/21/2017	3	TRANSMITTAL	MASON, STEVE (U.S. EPA)	DELGADO, ERIC (U.S. EPA)
			[REDACTED] NRC SPILL		
			REPORTS FROM DATES		
9796867	09/21/2017	3	08242017 TO 09212017	MASON, STEVE (U.S. EPA)	DELGADO, ERIC (U.S. EPA)
			[REDACTED] TRANSMITTAL		
	411		OF INOPERABLE DRINKING		
			WATER AND WASTE		
			WATER SYSTEMS LIST AND		
			A BOIL WATER NOTICE		LOESEL, MATTHEW (U.S.
9796871	09/01/2017	6	TRACKING LIST AS OF	ENGLERT, BRIAN (U.S. EPA)	EPA)
			[REDACTED] TRANSMITTAL		
			OF INOPERABLE DRINKING		
			WATER AND WASTE		
	CONTRACTOR		WATER SYSTEMS LIST AND		
			A BOIL WATER NOTICE	LOESEL, MATTHEW (U.S.	
9796872	09/01/2017	5	TRACKING LIST AS OF	EPA)	MARTIN, JOHN, J (U.S. EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] DISCUSSION	SMITH, MONICA, C (U.S.	
			REGARDING HURRICANE	EPA), FOSTER, ALTHEA	
			HARVEY STORY MAP WITH	(U.S. EPA), MASON, STEVE	LOESEL, MATTHEW (U.S.
9796873	10/11/2017	5	PHOTOGRAPHS	(U.S. EPA)	EPA)
			[REDACTED] DISCUSSION	SMITH, MONICA, C (U.S.	
			REGARDING HURRICANE	EPA), FOSTER, ALTHEA	
			HARVEY STORY MAP WITH	(U.S. EPA), LOESEL,	
9796874	10/11/2017	6	PHOTOGRAPHS	MATTHEW (U.S. EPA)	MASON, STEVE (U.S. EPA)
			[REDACTED] DISCUSSION	FOSTER, ALTHEA (U.S.	
			REGARDING HURRICANE	EPA), LOESEL, MATTHEW	
			HARVEY STORY MAP WITH	(U.S. EPA), MASON, STEVE	SMITH, MONICA, C (U.S.
9796875	10/11/2017	5	PHOTOGRAPHS	(U.S. EPA)	EPA)
			[REDACTED] SUBMITTAL		
			OF HURRICANE HARVEY		
			STORY MAP FOR SYSTEM	FOSTER, ALTHEA (U.S.	
			WIDE UPDATE PRESS	EPA), LOESEL, MATTHEW	
			RELEASE AND EPA STAFF	(U.S. EPA), MASON, STEVE	SMITH, MONICA, C (U.S.
9796876	10/11/2017	7	VISIT WITH PHOTOGRAPHS	(U.S. EPA)	EPA)
			[REDACTED] FORWARD OF		
			EMAIL REGARDING TCEQ		
			HURRICANE HARVEY	SMALLEY, BRYANT (U.S.	
9796883	09/04/2017	9	UPDATE - NO. 13	EPA)	CARROLL, CRAIG (U.S. EPA)
			[REDACTED] FORWARD OF	SMITH, MONICA, C (U.S.	
			EMAIL REGARDING TCEQ	EPA) WEBSTER, SUSAN, D	
			HURRICANE HARVEY	(U.S. EPA) SMALLEY,	CROSSLAND, RONNIE, D
9796884	09/05/2017	9	UPDATE - NO. 13	BRYANT (U.S. EPA)	(U.S. EPA)
			[REDACTED] TRANSMITTAL	1	
			OF TCEQ HURRICANE	EPA) WEBSTER, SUSAN, D	
			HARVEY UPDATE NO. 12	(U.S. EPA) FOSTER,	CROSSLAND, RONNIE, D
9796885	09/03/2017	6	SUPPORTING DOCUMENTS	ALTHEA (U.S. EPA)	(U.S. EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] FORWARD		
			AND DISCUSSION OF		
			STATUS OF WATER		
			SYSTEMS IN AREAS		GRANTHAM, NANCY (U.S.
9796891	09/03/2017	5	AFFECTED BY HARVEY	GRAY, DAVID (U.S. EPA)	EPA)
			[REDACTED] DISCUSSION		
I			REGARDING DISTRIBUTION		
			OF STATUS OF WATER		
			SYSTEMS IN AREAS	VELA, AUSTIN (U.S. EPA)	DURANT, JENNAH (U.S.
9796892	09/03/2017	6	AFFECTED BY HARVEY	GRAY, DAVID (U.S. EPA)	EPA)
				MEKEEL, EDWARD (U.S.	
			[REDACTED] EPA/TCEQ	EPA) KURYLA, MATTHEW	
			UPDATE - STATUS OF	(BAKER BOTTS), NONE	
			SYSTEMS AFFECTED BY	(TEXAS ALLIANCE OF	
9796893	09/09/2017	5	HURRICANE HARVEY	ENERGY PRODUCERS)	GRAY, DAVID (U.S. EPA)
 				GARCIA, RAMIRO (TEXAS	
				COMMISSION ON	
				ENVIRONMENTAL	
				QUALITY), LINDLEY,	
				EMILY (TEXAS	
			[REDACTED] NOTIFICATION	COMMISSION ON	
			REGARDING CALL IN	ENVIRONMENTAL	WADICK, ASHLEY, K
			INFORMATION FOR	QUALITY), WILSON, LORI	(TEXAS COMMISSION ON
			ARKEMA CONFERENCE	(TEXAS COMMISSION ON	ENVIRONMENTAL
9828391	09/02/2017	1	CALL ON 09/02/2017	ENVIRONMENTAL	QUALITY)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
				GARCIA, RAMIRO (TEXAS	
				COMMISSION ON	
				ENVIRONMENTAL	
				QUALITY), LINDLEY,	
				EMILY (TEXAS	
	440			COMMISSION ON	
			[REDACTED] REQUEST TO	ENVIRONMENTAL	WADICK, ASHLEY, K
			CHANGE TIME OF ARKEMA	QUALITY), WILSON, LORI	(TEXAS COMMISSION ON
			CONFERENCE CALL FOR	(TEXAS COMMISSION ON	ENVIRONMENTAL
9828392	09/02/2017	1	09/02/2017	ENVIRONMENTAL	QUALITY)
			[REDACTED] TRANSMITTAL	SMITH, MONICA, C (U.S.	
			OF SUMMARY REPORTS	EPA) FOSTER, ALTHEA	
			FROM TCEQ HURRICANE	(U.S. EPA) CARROLL,	CROSSLAND, RONNIE, D
9828393	08/30/2017	5	HARVEY UPDATE NO. 08	CRAIG (U.S. EPA)	(U.S. EPA)
			[REDACTED] DISCUSSION	WADICK, ASHLEY, K	
			OF CHANGE TIME OF	(TEXAS COMMISSION ON	
			ARKEMA CONFERENCE	ENVIRONMENTAL	SMALLEY, BRYANT (U.S.
9828394	09/02/2017	2	CALL FOR 09/02/2017	QUALITY)	EPA)
			[REDACTED] SPILL		
9828419	09/07/2017	6	REPORTS DATE 09072017	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)
			[REDACTED] SPILL		
9828420	09/07/2017	6	REPORTS 09072017	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)
			[REDACTED] SPILL		
9828421	09/06/2017	6	REPORTS FOR 09062017	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)
			[REDACTED] SPILL		
9828422	09/06/2017	6	REPORTS FOR 09062017	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)
			[REDACTED] SPILL		
9828423	09/07/2017	6	REPORTS FOR 09072017	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)
			[REDACTED] SPILL		
9828424	09/05/2017	6	REPORTS FOR 09052017	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] TRANSMITTAL		
			OF THE INOPERABLE PWS		
			AND WW LIST AND BOIL	CARROLL, CRAIG (U.S. EPA)	
			WATER NOTICE LIST WITH	FOSTER, ALTHEA (U.S.	
			THE TCEQ HURRICANE	EPA) SMITH, MONICA, C	CROSSLAND, RONNIE, D
9828425	08/30/2017	4	HARVEY UPDATE NO. 8	(U.S. EPA)	(U.S. EPA)
			[REDACTED] TRANSMITTAL		
			OF THE INOPERABLE PWS		
			AND WW LIST AND BOIL		
			WATER NOTICE LIST WITH	BUCHANAN, KAYLA (U.S.	
			THE TCEQ HURRICANE	EPA) MCDOWELL, JUSTIN	RESTIVO, ANGELA (U.S.
9828426	08/30/2017	4	HARVEY UPDATE NO. 8	(U.S. EPA)	EPA)
			[REDACTED] REQUEST	CARROLL, CRAIG (U.S. EPA)	
			THAT PERSONNEL BE	CROSSLAND, RONNIE, D	
			ASSIGNED TO COVER TCEQ	(U.S. EPA) EDLUND, CARL,	
9828428	08/31/2017	1	PHONE CALLS	E (U.S. EPA)	COLEMAN, SAM (U.S. EPA)
			[REDACTED] RESPONSE TO		
			REQUEST THAT		
			PERSONNEL BE ASSIGNED		
			TO COVER TCEQ PHONE		
9828429	08/31/2017	2	CALLS	FOSTER, ALTHEA (U.S. EPA)	CARROLL, CRAIG (U.S. EPA)
			[REDACTED] REQUEST TO		
			BE ADVISED ON EPA AIR		
			MONITORING ACTIVITIES		
			FOR AIR ALLIANCE	CARROLL, CRAIG (U.S. EPA)	
			HOUSTON	FOSTER, ALTHEA (U.S.	
			ENVIRONMENTAL HEALTH		BLANCO, ARTURO (U.S.
9828431	08/31/2017	1	CONCERNS	(U.S. EPA)	EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED]		
			CONFIRMATION OF		
			DISCUSSION REGARDING		
	under Contraction of the Contrac		SIGNIFICANT ISSUE		
			ARKEMA CROSBY PLANT		
	*		INUNDATION AND	SMALLEY, BRYANT (U.S.	
9828432	08/29/2017	4	POTENTIAL FIRE	EPA)	GRAY, DAVID (U.S. EPA)
			[REDACTED] RESPONSE TO		
			REQUEST FOR OFFICIAL		
	TATALON TO THE TATALO		STATEMENT REGARDING		
			ARKEMA LEAK FOR OFFICE	CARROLL, CRAIG (U.S. EPA)	
	under the second		OF ENVIRONMENTAL	FOSTER, ALTHEA (U.S.	
			JUSTICE TRIBAL AND	EPA) SMITH, MONICA, C	
9828433	08/31/2017	1	INTERNATIONAL AFFAIRS	(U.S. EPA)	GRAY, DAVID (U.S. EPA)
			[REDACTED]		
			CONFIRMATION OF		
			RESPONSE TO REQUEST		
			FOR OFFICIAL STATEMENT		
			REGARDING ARKEMA		
			LEAK FOR OFFICE OF	CARROLL, CRAIG (U.S. EPA)	
	under Contraction of the Contrac		ENVIRONMENTAL JUSTICE	GRAY, DAVID (U.S. EPA)	
			TRIBAL AND	SMITH, MONICA, C (U.S.	BLANCO, ARTURO (U.S.
9828434	08/31/2017	2	INTERNATIONAL AFFAIRS	EPA)	EPA)
	- National Control of the Control of		[REDACTED] SUGGESTIONS		
	***		REGARDING WHO SHOULD	CARROLL, CRAIG (U.S. EPA)	
			COVER PHONE CALLS WITH	FOSTER, ALTHEA (U.S.	SMALLEY, BRYANT (U.S.
9828436	08/31/2017	2	TCEQ	EPA)	EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED]		
			CONFIRMATION OF		
			REQUEST THAT		
			PERSONNEL NEED TO BE		
	THE PROPERTY OF THE PROPERTY O		ASSIGNED TO COVER TCEQ		
9828438	08/31/2017	2	PHONE CALLS	COLEMAN, SAM (U.S. EPA)	CARROLL, CRAIG (U.S. EPA)
	unino contra de la contra del la co		[REDACTED] TRANSMITTAL		
			OF DRINKING WATER		
	Name of Contract o		SAMPLING LOCATIONS		
			MAP AND THE	HILL, CRAIG (HARRIS	
			PRELIMINARY DRINKING	COUNTY POLLUTION	
			WATER SAMPLING	CONTROL SERVICES	CENCETTI, JEANMARIE
9828440	09/21/2017	2	RESULTS	DEPARTMENT)	(ARKEMA INCORPORATED)
			[REDACTED] DRINKING		
			WATER SAMPLING		
	under the second		LOCATIONS MAP - ARKEMA		
			HURRICANE HARVEY		
9828442	09/21/2017	1	RESPONSE	NONE (NONE SPECIFIED)	NONE (CTEH)
			[REDACTED] PRELIMINARY		
0000110	00/01/0015	1.00	DRINKING WATER	NOVE GIOVE GREGIERS	NOTE GIOLE OPECHED)
9828443	09/21/2017	108	SAMPLING RESULTS	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)
				GARCIA, RAMIRO (TEXAS	
	THE PROPERTY OF THE PROPERTY O			COMMISSION ON	
				ENVIRONMENTAL	
				QUALITY), LINDLEY,	
				EMILY (TEXAS	
				COMMISSION ON	WADICK ACHIEV K
			[DED A CTED] MOTIEIC ATION	ENVIRONMENTAL	WADICK, ASHLEY, K
	***		[REDACTED] NOTIFICATION	1	(TEXAS COMMISSION ON
0020451	00/02/2017	1	OF CONFERENCE CALL	(TEXAS COMMISSION ON	ENVIRONMENTAL
9828451	09/03/2017	<u> </u>	REGARDING ARKEMA	ENVIRONMENTAL	QUALITY)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] NOTIFICATION		
			THAT TIME FOR		
			CONFERENCE CALL WITH		
			ARKEMA FACILITY HAS	TRAYLOR, PATRICK (U.S.	
9828454	09/02/2017	2	BEEN UPDATED	EPA)	COLEMAN, SAM (U.S. EPA)
			[REDACTED] NOTIFICATION		
			OF EPA PERSONNEL		
			SIGNING OFF 09/02/2017		
			ARKEMA CONFERENCE		WAGNER, KENNETH (U.S.
9828455	09/02/2017	10	CALL	JACKSON, RYAN (U.S. EPA)	EPA)
			[REDACTED] RESPONSE TO		WAGNER, KENNETH (U.S.
9828456	09/02/2017	11	QUERY FOR CALL	COLEMAN, SAM (U.S. EPA)	EPA)
			[REDACTED] INQUIRY INTO		
			PREFERRED METHOD OF		
			COMMUNICATION		
			REGARDING REQUEST FOR		
			STORAGE SITUATION AND		TRAYLOR, PATRICK (U.S.
9828457	09/02/2017	4	BACKUP POWER	COLEMAN, SAM (U.S. EPA)	EPA)
			[REDACTED] DISCUSSION		
			REGARDING QUERY FOR	WAGNER, KENNETH (U.S.	
9828458	09/02/2017	11	CALL	EPA)	COLEMAN, SAM (U.S. EPA)
			[REDACTED] RESPONSE TO		
			REQUEST FOR CALL AFTER		
			09/0 2 /2017 ARKEMA	TRAYLOR, PATRICK (U.S.	
9828459	09/02/2017	3	CONFERENCE CALL	EPA)	COLEMAN, SAM (U.S. EPA)
	-		[REDACTED] REQUEST FOR		
			CALL AFTER 09/02/2017		
			ARKEMA CONFERENCE		TRAYLOR, PATRICK (U.S.
9828460	09/02/2017	3	CALL	COLEMAN, SAM (U.S. EPA)	EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] TRANSMITTAL		
			OF DRAFT LETTER TO		
			ARKEMA REGARDING		
	under Contraction of the Contrac		INCOMPLETE	EDLUND, CARL, E (U.S.	
			INFORMATION PROVIDED	EPA) COLEMAN, SAM (U.S.	
			AND INVITATION TO	EPA) PAYNE, JAMES, O	PETERSON, MARY (U.S.
9828461	09/02/2017	1	CONFERENCE CALL	(U.S. EPA)	EPA)
			[REDACTED] CTECH SOLID		
	unamono de la companio del companio de la companio del companio de la companio della companio de la companio della companio de		BULK ASH SAMPLING		
			LOCATIONS ARKEMA		
			HURRICANE HARVEY	NONE (ARKEMA	
9828462	09/12/2017	1	RESPONSE MAP	INCORPORATED)	NONE (CTEH)
	THE PROPERTY OF THE PROPERTY O		[REDACTED] ARKEMA		
	Name of the Control o		HARVEY RESPONSE		
			ANALYTICAL SAMPLING		
			RESULTS SOLID BULK		
			PRODUCT AND WASTE		
	under the second		CHARACTERIZATION		
9828463	09/13/2017	5	SAMPLES	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)
	Name of the second		[REDACTED] CTEH		
			DRINKING WATER		
	THE PROPERTY OF THE PROPERTY O		SAMPLING LOCATIONS		
	Venezion		PROJECT 109489 ARKEMA		
			HURRICANE HARVEY	NONE (ARKEMA	
9828464	09/21/2017	1	RESPONSE MAP	INCORPORATED)	NONE (CTEH)
			[REDACTED] PRELIMINARY		
	Name of the Control o		DRINKING WATER		
9828465	09/21/2017	108	SAMPLING RESULTS	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] DISCUSSION		
			REGARDING FACILITY		
			ASSISTANCE REQUEST		
			CONCERNING ARKEMA	LEONOVA, LARISA (U.S.	BERNIER, ROBERTO, L (U.S.
9828466	08/29/2017	2	CROSBY, TEXAS UPDATE	EPA)	EPA)
			[REDACTED] NOTIFICATION OF ARKEMA PLANT		
			REPRESENTATIVE		
			CONTACT INFORMATION	BERNIER, ROBERTO, L (U.S.	CENCETTI IEANMADIE
9828477	09/07/2017)	FOR CENTERPOINT ENERGY	, , ,	(ARKEMA INCORPORATED)
9828477	09/07/2017		TOR CENTERION TENEROT	Li A)	(ARREMA INCORTORATED)
			[REDACTED] REQUEST TO		
			SEE NOTIFICATION OF		
			ARKEMA PLANT		
			REPRESENTATIVE		
			CONTACT INFORMATION	LARSON, DARRIN (U.S.	BERNIER, ROBERTO, L (U.S.
9828478	09/07/2017	2	FOR CENTERPOINT ENERGY	EPA)	EPA)
			[REDACTED] ARKEMA		
			HARVEY RESPONSE		
			ANALYTICAL SAMPLING		
			RESULTS SOLID BULK		
			PRODUCT AND WASTE		
			CHARACTERIZATION		
			SAMPLES 09032017 TO		
			09062017 DATA RECEIVED		
9828479	09/13/2017	5	AS OF 09132017	NONE (NONE SPECIFIED)	NONE (NONE SPECIFIED)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] FORWARDING		
			OF NOTIFICATION THAT		
			IMAAC HAS BEEN ASKED		
			TO CREATE A MODELING		
			PRODUCT FOR		
			HYPOTHETICAL CHEMICAL		
			RELEASE IN CROSBY		
			TEXAS AND INVITATION TO	BERNIER,ROBERTO,L (U.S.	LEONOVA, LARISA (U.S.
9828480	08/29/2017	1	TELECONFERENCE	EPA)	EPA)
				RHOTENBERRY,WILLIAM	
			[REDACTED] DISCUSSION	(U.S. EPA) YOUNG,	
			REGARDING SUPPORT FOR	PATRICK (AGENCY FOR	
			CONCERNED CITIZEN	TOXIC SUBSTANCES AND	BAKER, DAVID (BAYLOR
9828481	08/30/2017	2	INQUIRIES	DISEASE REGISTRY)	SCOTT & WHITE HEALTH)
			[REDACTED] TRANSMITTAL		
			OF THREE DOCUMENTS		
			RELATED TO ARKEMA		
			RESPONSE INFORMATION		SMITH, MONICA, C (U.S.
9828483	08/31/2017	28	AND PLAN	MASON, STEVE (U.S. EPA)	EPA)
			[REDACTED] RESPONSE TO		
			THE ARKEMA CROSBY		
			PLANT TEXAS INUNDATION		
	1		POTENTIAL FIRE FACILITY		
9828484	08/29/2017	3	CONTACT INFORMATION	FIFE, GREG (U.S. EPA)	MASON, STEVE (U.S. EPA)

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ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
				GARCIA, RAMIRO (TEXAS	
				COMMISSION ON	
				ENVIRONMENTAL	
				QUALITY), LINDLEY,	
			[REDACTED] WEB LINK TO	EMILY (TEXAS	
			ARKEMA WEBSITE WITH	COMMISSION ON	
			INFORMATION ON THE	ENVIRONMENTAL	WADICK, ASHLEY, K
			RAW MATERIAL AND	QUALITY), WILSON, LORI	(TEXAS COMMISSION ON
			PRODUCTS AT CROSBY	(TEXAS COMMISSION ON	ENVIRONMENTAL
9828485	09/01/2017	3	PLANT	ENVIRONMENTAL	QUALITY)
				GARCIA, RAMIRO (TEXAS	
				COMMISSION ON	
				ENVIRONMENTAL	
				QUALITY), LINDLEY,	
				EMILY (TEXAS	
				COMMISSION ON	
			[REDACTED] FORWARD OF	ENVIRONMENTAL	WADICK, ASHLEY, K
			INVITATION TO ARKEMA	QUALITY), WILSON, LORI	(TEXAS COMMISSION ON
			PRESS CONFERENCE CALL	(TEXAS COMMISSION ON	ENVIRONMENTAL
9828486	09/01/2017	2	ON 09/01/2017	ENVIRONMENTAL	QUALITY)
			[REDACTED] FORWARD OF		
			INVITATION TO ARKEMA	TAHERI, DIANE (U.S. EPA)	
			PRESS CONFERENCE CALL	GRAY, DAVID (U.S. EPA)	
9828487	09/01/2017	2	ON 09/01/2017	BOWMAN, LIZ (U.S. EPA)	COLEMAN, SAM (U.S. EPA)

DOCUMENT	DOCUMENT	PAGE			
ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
				GARCIA, RAMIRO (TEXAS	
				COMMISSION ON	
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				QUALITY), LINDLEY,	
				EMILY (TEXAS	
			[REDACTED]	COMMISSION ON	
			CONFIRMATION OF	ENVIRONMENTAL	
			INVITATION TO ARKEMA	QUALITY), WILSON, LORI	
			PRESS CONFERENCE CALL	(TEXAS COMMISSION ON	
9828488	09/01/2017	2	FOR 09/01/2017	ENVIRONMENTAL	GRAY, DAVID (U.S. EPA)
			[REDACTED]		
			CONFIRMATION OF		WADICK, ASHLEY, K
			PARTICIPATION IN		(TEXAS COMMISSION ON
			09/01/2017 ARKEMA PRESS		ENVIRONMENTAL
9828489	09/01/2017	2	CONFERENCE CALL	GRAY, DAVID (U.S. EPA)	QUALITY)
			[REDACTED]		
			CONFIRMATION OF		
			NOTIFICATION THAT TCEQ		
			RECEIVED A CALL FROM		
			THE DIRECTOR OF		
			ENVIRONMENTAL AND	SOTELO, CATHERINE	
			SUSTAINABLE	(TEXAS COMMISSION ON	
			DEVELOPMENT FOR THE	ENVIRONMENTAL	
9828490	08/29/2017	3	ARKEMA FACILITY	QUALITY)	MASON, STEVE (U.S. EPA)
			[REDACTED] NOTIFICATION		
			THAT TCEQ RECEIVED A		
			CALL FROM THE DIRECTOR		de la constant de la
			OF ENVIRONMENTAL AND		SOTELO, CATHERINE
			SUSTAINABLE		(TEXAS COMMISSION ON
			DEVELOPMENT FOR THE		ENVIRONMENTAL
9828491	08/29/2017	3	ARKEMA FACILITY	MASON, STEVE (U.S. EPA)	QUALITY)

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ID	DATE	COUNT	TITLE	ADDRESSEE	AUTHOR
			[REDACTED] TRANSMITTAL		
			OF IMAAC REAL WORLD		
			SULFUR DIOXIDE RELEASE		
			AND ORGANIC PEROXIDE		
			FIRE AND OR EXPLOSION		
			AT ARKEMA CHEMICAL		
			PLANT IN CROSBY TEXAS	BERNIER, ROBERTO, L (U.S.	
			UPDATE NUMBER 4	EPA) DELGADO, ERIC (U.S.	LEONOVA, LARISA (U.S.
9858450	08/31/2017	1	WEATHER 08312017	EPA)	EPA)